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February 18, 2010

**VIA EMAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

John F. Cermak, Jr.
direct dial: 310.442.8885
jccermak@bakerlaw.com

Mr. Stephen Tzhone, Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

9647642

Ms. Barbara A. Nann, Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 6
Superfund Division (6RC-S)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733



Re: Unilateral Administrative Order for Remedial Investigation/Feasibility Study
("UAO"), San Jacinto River Waste Pits Site – Financial Assurance
Requirements under Paragraph 93 of the UAO

Dear Stephen and Barbara:

This letter is being submitted jointly on behalf of International Paper Company ("IPC") and McGinnes Industrial Maintenance Corporation ("MIMC"), as Respondents under the above-referenced UAO. Paragraph 93 of the UAO requires that Respondents demonstrate the ability to perform and pay for work required by the UAO. Respondents understand that EPA, for purposes of Paragraph 93, is requiring that they provide financial assurance in the amount of \$3 million.¹

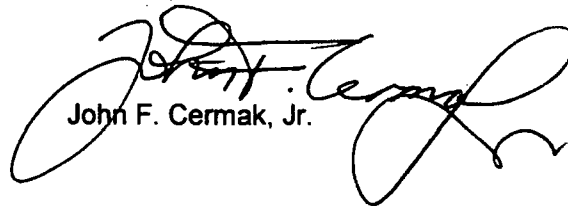
For that purpose, Respondent MIMC is relying upon the \$2 million bond it posted as part of its "good faith offer" to EPA dated September 17, 2009, a copy of which is enclosed with this letter. We understand that MIMC will separately confirm to EPA that it is prepared to have the bond extended or reissued prior to its expiration to ensure continued compliance with Paragraph 93. International Paper is relying on internal financial information, as set forth in its February 26, 2009 10-K filing with the Security

¹ Respondents' understanding is based on February 17, 2010 email messages from Stephen Tzhone to March Smith on behalf of MIMC directing Respondents to use a \$3 million figure for purposes of demonstrating ability to perform under Paragraph 93 of the UAO.

and Exchange Commission. A copy of the cover page of the 10-K, together with its Table of Contents, is attached to the copy of this letter being sent to you by e-mail. A complete copy of the 10-K document is enclosed with the copy of this letter being sent to you by certified mail. The entire document can be accessed via the Internet at <http://www.sec.gov/Archives/edgar/data/51434/000119312509038657/d10k.htm>. Please note that International Paper anticipates that it will file another 10-K in March 2010, and that document can be provided to you, upon request, once it is filed.

Please confirm in writing that the combination of financial assurance mechanisms set forth above satisfies the requirements under Paragraph 93 of the UAO. To the extent that EPA requires any additional information regarding such financial assurances, please contact the undersigned.

Sincerely,



John F. Cermak, Jr.

Enclosures

cc: Albert R. Axe, Jr., Counsel for MIMC (via email)

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November 18, 2015

VIA EMAIL AND FEDEX

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Re: Unilateral Administrative Order for Remedial Investigation/Feasibility Study
("UAO"), San Jacinto River Waste Pits Superfund Site - Financial Assurance
Requirements under Paragraph 93 of the UAO

Dear Gary, Anne and Amy:

This letter is being submitted on behalf of International Paper Company ("International Paper"), as one of the Respondents under the above-referenced UAO. Enclosed is internal financial information in the form of International Paper's February 27, 2014 10-K filing with the Security and Exchange Commission ("SEC"). The document can also be accessed via the Internet on the SEC's website at <http://www.sec.gov>. This letter and the enclosed document updates International Paper's

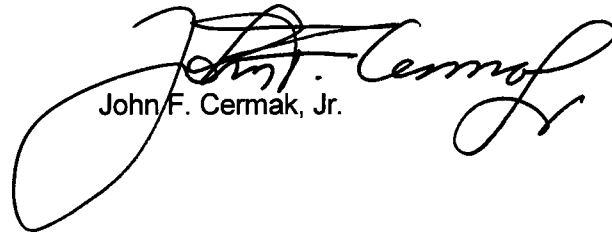
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Page 2

prior financial assurance submissions, including its joint submission with Respondent McGinnes Industrial Maintenance Corporation dated February 18, 2010, a copy of which (without enclosures) is enclosed for your reference.

To the extent that EPA requires any additional information regarding International Paper's financial assurances, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "John F. Cermak, Jr.", with a large, stylized initial "J" and "C".

John F. Cermak, Jr.

Enclosures